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Attorney for Plaintiff Rebekah Massie

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF ARIZONA

Rebekah Massie; and Quintus Schulzke,

Plaintiffs,

v.

City of Surprise, a municipal corporation
and a governmental entity; Skip Hall, in his
individual capacity; and Steven Shernicoff,
in his individual capacity,

Defendants.

Case No: 2:24-cv-02276-ROS--DMF

**STIPULATED MOTION TO
EXTEND DEADLINE TO FILE
RESPONSE TO PLAINTIFF'S FIRST
AMENDED COMPLAINT**

(Third Request)

Plaintiff Rebekah Massie and Defendants City of Surprise, a municipal corporation
and a government entity, Skip Hall, in his individual capacity, and Steven Shernicoff, in

his individual capacity (the “Parties”), by and through undersigned counsel, hereby file this Motion to extend the deadline for Defendants to respond to Plaintiff’s First Amended Complaint. On January 17, 2025, Plaintiff filed her First Amended Complaint. On January 27, 2025, the parties engaged in a LRCiv. 12.1 meeting in which several possible motions to dismiss issues were raised. The deadline to answer, or otherwise respond to, the First Amended Complaint is February 7, 2024. The parties wish to continue discussions regarding potential dispositive issues and consider the possibility of case resolution and, for those reasons, request a 60-day extension of the February 7, 2025 date for these purposes.

This Stipulated Motion is made for good cause, in good faith, and not for the purpose of undue delay.

A Proposed Order is attached hereto as Exhibit A.

DATED this 5th day of February, 2025.

JELLISON LAW OFFICES, PLLC

By: s/ James M. Jellison

James M. Jellison, Esq.

Attorney for Defendants City of Surprise, Skip Hall and Steven Shernicoff

FOUNDATION FOR INDIVIDUAL RIGHTS
AND EXPRESSION

By: s/ Conor T. Fitzpatrick

Conor T. Fitzpatrick, Esq.

Adam B. Steinbaugh, Esq.

Attorneys for Plaintiff Rebekah Massie

DANIEL J. QUIGLEY, P.L.C.

By: s/ Daniel J. Quigley

Daniel J. Quigley

Attorney for Plaintiff Rebekah Massie

CERTIFICATE OF FILING AND MAILING

I hereby certify that on February 5, 2025, I electronically transmitted the attached document to the Clerk's office using the CM/ECF system for filing and transmittal of a Notice of Electronic filing to the following registrants:

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By: s/ Alex Wasko